

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Waiver of Sections 90.1307(c) and (d)	)	WTB Docket No. 18-353
and Sections 90.1338(a) and (b)	)	
of the Commission's Rules	)	
	)	

**COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS**

California Internet, L.P. DBA GeoLinks ("GeoLinks" or the "Company") submits these comments in support of the Petition for Waiver of sections 90.1307 (c) and (d) and Sections 90.1338(a) and (b) of the Commission's Rules filed by The Wireless Internet Service Providers Association ("WISPA") and the Utilities Technology Council ("UTC") on October 4, 2018 ("Petition").<sup>1</sup>

GeoLinks was recently awarded Connect America Fund Phase II ("CAF II") funding to provide highspeed broadband service to 3883 Census Blocks (in 242 Census Blocks Groups) in extremely remote parts of California and Nevada. As part of its application to the Commission under the CAF II auction process, GeoLinks explained that, among other spectrum resources, it would look to utilize spectrum in the 3.65-3.7 GHz band to provide high speed broadband service to the unserved and underserved rural areas it was awarded.

GeoLinks has advocated for spectrum policies that allow fixed wireless broadband providers the opportunity to compete with traditional, wired providers in numerous proceedings before the Commission. Because spectrum resources are finite and require significant investment to utilize (i.e. license costs, equipment costs, equipment deployment, etc.), spectrum rules and policies should be structured in a way that give certainty to license holders and promote ongoing deployment. GeoLinks believes that the current expiration date of April 17, 2020 may not allow Licensees to fully utilize their 3.65-3.7 spectrum resources or realize the benefits of their investments.

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<sup>1</sup> See Public Notice, *Wireless Telecommunications Bureau Seeks Comment on Wireless Internet Service Providers Association and Utilities Technology Council Request for Waiver of Citizens Broadband Radio Service Transition Deadline*, WTB Docket No. 18-353 (rel. Nov. 27, 2018) ("Public Notice").

As explained in the Petition, the transition period ending on April 17, 2020 was believed to be sufficient to ensure that Licensees would not lose their investments in the 3.65-3.7 GHz band and would have sufficient time to conform their operations to the Part 96 rules.<sup>2</sup> However, full-scale commercial deployment will not be practical until 2019 due to delays in the development of test procedures and certifications for professional installers, etc. – leaving just one year for Licensees to obtain and install any equipment necessary to transition to CBRS. GeoLinks agrees with WISPA and UTC that the 2020 deadline should be extended to allow Licensees additional time to transition to Part 96 rules. Failure to do so could lead to stranded investment for Licensees and stifled deployment of the 3.65-3.7 GHz band.

Therefore, GeoLinks supports the Petition's request for extension to transition to Part 96 rules through January 8, 2023.

Respectfully submitted,

**GEOLINKS, LLC**

/s/ Skyler Ditchfield, Chief Executive Officer  
/s/ Melissa Slawson, General Counsel/ V.P of Government  
Affairs and Education

December 12, 2018

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<sup>2</sup> Petition at 4, citing *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959 (2015) ("CBRS Order"), at 4076-77.